

March 13, 2006

Peter C. Riccardella
Sr. Associate and Chief Technology Officer
6855 S. Havana Street
Suite 350
Centennial, CO 80112-3866

SUBJECT: STRUCTURAL INTEGRITY ASSOCIATES, INC., REQUEST FOR
WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE FOR SAN
ONOFRE NUCLEAR GENERATING STATION, UNIT 2 (TAC NO. MD0191)

Dear Mr. Riccardella:

By letter dated February 22, 2006, Southern California Edison submitted an affidavit dated February 22, 2006, executed by you, requesting that the information contained in the following drawings be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390:

1. Pressurizer Nozzle Detail, 41011, Sheet 1, Revision 0
2. Pressurizer Nozzle Detail, 41011, Sheet 2, Revision 0
3. Pressurizer Nozzle Detail, 41011, Sheet 3, Revision 0
4. Pressurizer Nozzle Detail, 41011, Sheet 4, Revision 0

Since a nonproprietary copy of this document was not submitted, the entire package sent by you, except the four drawings identified above, have been placed in the Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the Agencywide Documents Access and Management System Public Electronic Reading Room.

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by SI [Structural Integrity Associates, Inc.].
- (ii) The information is of a type customarily held in confidence by SI and not customarily disclosed to the public.
 - (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of SI's competitors without license from SI constitutes a competitive economic advantage over other companies.
 - (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data

- secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of SI, its customers or suppliers.
- (e) It reveals aspects of past, present, or future SI or customer funded development plans and programs of potential commercial value to SI.
- (f) It contains patentable ideas, for which patent protection may be desirable.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

Therefore, the four drawings marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-1480.

Sincerely,

/RA/

N. Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-361

cc: See next page

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February 2006

San Onofre Nuclear Generating Station
Units 2 and 3

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February 2006